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U.S. DISTRICT COURT
DISTRICT OF MASS

LEE CARL BROMBERG

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May 22, 2006

VIA HAND DELIVERY

The Honorable Patti B. Saris
United States District Clerk for the District of Massachusetts
John Joseph Moakley Courthouse
One Courthouse Way
Boston, MA 02110

Re: *ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al.*
Civil Action No. 04-10353 (PBS)
Our File: 02639/00509

Your Honor:

In anticipation of tomorrow's hearing on the Neutral Expert, we enclose ScanSoft's Proposal for Concluding the Neutral Expert Procedure.

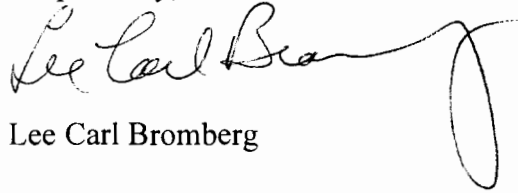
To streamline the procedure and address Prof. Ney's stated concerns about the amount of work involved in reviewing these extremely large speech recognition programs we suggest two steps be taken.

First, that the independent speech recognition experts from each side examine the code pursuant to the Protective Order and report their findings to Prof. Ney, who may then rely upon their reports in preparing his neutral expert report.

Secondly, reduce the demands on Prof. Ney's time by removing the '630 patent issues from his assignment. ScanSoft is willing to waive the protection of a threshold determination on infringement and give an opportunity to VST to conduct whatever further discovery it considers on the '630 patent by July 15, 2006. Meanwhile, ScanSoft will undertake to prepare and file a motion for summary judgment on the '630 patent issues by August 1, 2006.

Honorable Patti B. Saris
United States District Clerk for the District of Massachusetts
May 22, 2006
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Respectfully,

A handwritten signature in black ink, appearing to read "Lee Carl Bromberg", with a large, stylized loop at the end.

Lee Carl Bromberg

LCB/jmc

cc: Robert S. Frank, Esq.
Ms. Christine Patch, Docket Clerk

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